

EXHIBIT 2

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 19 Civ. 08655 (LGS)(GWG)

NOTICE OF 30(b)(6) DEPOSITION

TO: PAUL HASTINGS LLP
Kenneth W. Gage
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PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Ulku Rowe shall take the deposition upon oral examination of Defendant, Google LLC, through one or more officers, directors, agents or other representatives who shall be designated to testify on Defendant's behalf regarding all information known or reasonably available to Defendant with respect to the topics identified below. The deposition will take place

on May 4, 2020, or an alternate date mutually agreed upon by the Parties, beginning at 9:30 a.m., and will continue from day-to-day until completed, at the law offices of Plaintiff's counsel, Outten & Golden LLP, 685 Third Avenue, 25th Fl., New York, New York 10017. Plaintiff requests that Defendant provide written notice at least ten (10) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on Defendant's behalf. The deposition will take place before a court reporter, notary public or other person authorized by law to administer oaths and take depositions, and the deposition testimony will be recorded by audio, audiovisual and/or stenographic means.

DEFINITIONS AND INSTRUCTIONS

1. Except as otherwise defined or broadened in this notice of deposition, Plaintiff incorporates by reference the definitions set forth in Federal Rules of Civil Procedure 26, 30, and 34, and, unless otherwise indicated below, the definitions set forth in Plaintiff's First Set of Requests for Production of Documents.

2. Unless otherwise indicated, the terms "Defendant" and "Google" are used interchangeably and refer to Defendant Google LLC.

3. Unless otherwise indicated, the topics relate to the time period of June 2016 to the present.

4. The terms "policy" and "policies" shall mean each rule, procedure, or directive, formal or informal, and each common understanding or course of conduct that was recognized as such by Defendant's present or former officers, agents, employees, or other persons acting or purporting to act on its behalf, that was in effect at any time during the period covered by this deposition notice. These terms include any change of policy.

5. The terms “practice” or “practices” shall mean Google’s (i) actual application or use of its policy or policies or (ii) the customary, habitual or expected procedure or way of doing something. These terms include any changes to a practice or practices.

TOPICS

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant shall make a separate designation of the person or persons to testify regarding each of the following matters, and each person designated shall make a diligent investigation prior to the deposition of all information available to Defendant, including facts known by Defendant’s counsel as facts known or available to the most knowledgeable employees, and shall bring to the deposition whatever notes or supporting documentation is necessary to answer completely on behalf of Defendant with regard to the following issues:

1. Defendant’s organizational structure and hierarchy, including all job titles, job posting(s), job description(s), daily activities, job duties, and responsibilities for Principal Technical Solutions Consultants, Distinguished Technical Solutions Consultants, and/or Technical Directors within Google Cloud. With respect to the job posting(s) and job description(s):

- a. The process by which the job description(s) and job posting(s) were drafted and/or developed;
- b. The criteria and responsibilities for each position;
- c. The employees covered by the job description(s) and job posting(s); and
- d. Any changes to the contents of the job description(s) and job posting(s).

2. Defendant’s policies and practices, as to Levels 8, 9, and 10, regarding the following:

- a. leveling;

- b. hiring;
- c. promotion;
- d. transfer;
- e. compensation; and
- f. equity awards.

3. The job duties, responsibilities, qualifications, requirements, performance review procedures, and/or primary or essential job functions of employees at Levels 8, 9, and 10 within Google Cloud;

4. Any analyses, studies, research, validation, or audits commissioned, conducted, or reviewed by Defendant relating to its equal pay policies, procedures, and practices;

5. The existence and nature of any external complaints regarding gender discrimination or pay equity, including any charges filed with an administrative agency, tribunal, ADR forum or court. The relevant time period for this inquiry is January 2015 through the present;

6. The existence and nature of any internal complaints regarding gender discrimination or pay equity, including any complaint made via Defendant's grievance process. The relevant time period for this inquiry is January 2015 through the present; and

7. Defendant's policies and practices regarding investigating and responding to Internal Complaints and External Complaints of discrimination and retaliation.

Dated: March 25, 2020
New York, NY

Respectfully Submitted,

By: /s/ Cara E. Greene
Cara E. Greene

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on March 25, 2020, a copy of the foregoing Notice of 30(b)(6) Deposition was sent via email and first-class mail, postage prepaid, to the following individuals:

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By: /s/ Cara E. Greene
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